

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: NATIONAL FOOTBALL LEAGUE PLAYERS'  
CONCUSSION INJURY LITIGATION

Kevin Turner and Shawn Wooden, on behalf of themselves  
and others similarly situated,

Plaintiffs,

v.

National Football League and NFL Properties LLC,  
successor-in-interest to NFL Properties, Inc.,

Defendants.

No. 2:12-md-02323-AB

MDL No. 2323

**Hon. Anita B. Brody**

CIVIL ACTION NO: 2:14-cv-  
00029-AB

THIS DOCUMENT RELATES TO:  
ALL ACTIONS

**SUPPLEMENTAL DECLARATION OF CHRISTOPHER A. SEEGER IN LIMITED  
RESPONSE TO FRED WILLIS' UNAUTHORIZED ADDITIONAL FILINGS  
AND IN FURTHER SUPPORT OF MOTION FOR INJUNCTION PROHIBITING  
IMPROPER COMMUNICATIONS WITH THE CLASS**

CHRISTOPHER A. SEEGER declares, pursuant to 28 U.S.C. § 1746, based upon his personal knowledge, information and belief, the following:

1. Having been appointed as Co-Lead Class Counsel, I am fully familiar with the matters set forth herein, including the procedural history of this litigation and the class-wide Settlement that this Court approved on April 22, 2015 ("Settlement"). I submit this Supplemental Declaration in limited response to Fred Willis' unauthorized additional filings and in further support of Co-Lead Class Counsel's motion (ECF No. 7175) for an injunction prohibiting Willis' improper communications with Class Members ("Motion").

2. Recently, I have become aware of additional alleged misrepresentations to Class Members by Fred Willis and confusion that has been created as a result of his dissemination of misinformation along the lines of that which was addressed in Co-Lead Class Counsel's opening papers in support of the Motion, including the memorandum [ECF No. 7175-1] and my initial Declaration [ECF No. 7175-2].

3. Specifically, I have received emails either written by Willis and forwarded to me by Gay Culverhouse, or written by Dr. Culverhouse concerning her communications with Class Members concerning Mr. Willis. Dr. Culverhouse is the former President of the Tampa Bay Buccaneers and maintains personal relationships with many Retired NFL Football Players.

4. On March 4, 2017, I received an email from Dr. Culverhouse reporting on her discussions with Class Members concerning Willis' representations. Attached hereto as Exhibit 1 is a true and correct copy of that email. To protect her privacy, I have redacted Dr. Culverhouse's email address.

5. Attached hereto as Exhibit 2 is a true and correct copy of a March 7, 2017 email sent by Willis to Dr. Culverhouse and others, which she forwarded to me, reflecting Willis' communications with certain entities, concerning lien resolution. Co-Lead Class Counsel hope to explore the scope of those entities' involvement with Class Members through Willis, if the Court permits them to take discovery of him.

6. Attached hereto as Exhibit 3 is a true and correct copy of a March 8, 2017 email sent by Willis and forwarded to me by Dr. Culverhouse, following up on the March 7, 2017 email and concerning discussions with a representative of an entity called "Millennium Settlements."

7. Attached hereto as Exhibit 4 is a true and correct copy of an email, dated March 21, 2017, from Dr. Culverhouse concerning her conversation with a Class Member and reporting on Willis' alleged representations to Class Members.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on March 28, 2017

/s/ Christopher A. Seeger  
CHRISTOPHER A. SEEGER  
Co-Lead Class Counsel

# Exhibit 1

**From:** [REDACTED]  
**Date:** March 4, 2017 at 5:42:38 PM EST  
**To:** <[cseeger@seegerweiss.com](mailto:cseeger@seegerweiss.com)>  
**Subject:** Gay here asking for advice

I spoke with two players this afternoon, one in Florida and one in Mississippi. Fred Willis has been going around the country meeting groups of players.

For twenty percent of your payout he'll set you up with a medical establishment in LA that promises to see your future CTE damage not just what is current. You will, therefore, receive more funds than you normally would under the settlement agreement. Furthermore he guarantees an expedited process.

So, as was explained to me by a player, if you are now 59 he can have you seen before you reach age 60 and go into a lower payment bracket.

Since Fred was a player, they trust him.

The WIKI explains his history with CTE.

[https://en.m.wikipedia.org/wiki/Fred\\_Willis](https://en.m.wikipedia.org/wiki/Fred_Willis)

Thank you  
Gay

Sent from my iPhone

# Exhibit 2

---

**From:** [REDACTED]  
**Sent:** Tuesday, March 07, 2017 4:55 PM  
**To:** Chris Seeger <[cseeger@seegerweiss.com](mailto:cseeger@seegerweiss.com)>  
**Subject:** Fwd: From: Fred Willis Executive Director NFL Players Brains Matter Re: The Lien resolution Process for the NFL Concussion Settlement

Read his cc list of financial institutions

Sent from my iPhone

Begin forwarded message:

**From:** fred willis <[fred.willis@hpnneurologic.com](mailto:fred.willis@hpnneurologic.com)>  
**Date:** March 7, 2017 at 10:49:42 AM EST  
**To:** 'Fernandez Anderson' <[fanderson@msettlements.com](mailto:fanderson@msettlements.com)>  
**Cc:** [tbolar@aol.com](mailto:tbolar@aol.com), [jess@plaintiffsupport.com](mailto:jess@plaintiffsupport.com), 'Gary Goldberg' <[ggoldberg@providiollc.com](mailto:ggoldberg@providiollc.com)>, [pcody@counselfinancial.com](mailto:pcody@counselfinancial.com), [mtorbert@ametrosfinacial.com](mailto:mtorbert@ametrosfinacial.com), [REDACTED]  
**Subject:** From: Fred Willis Executive Director NFL Players Brains Matter Re: The Lien resolution Process for the NFL Concussion Settlement



March 7, 2017

From: Fred Willis Executive Director of NFL Players Brains Matter

Re: The Lien resolution Process for the NFL Concussion Settlement

Fernandez Anderson, CSSC  
Senior Consultant  
Millennium Settlements

Jessica Schreiber  
Director of Business Development  
PLAINTIFF SUPPORT

Gary Goldberg  
Providio MediSolutions, LLC

Mr. Marques D. Torbert  
Chief Executive Officer  
Ametros Financial Corporation.

Paul Cody  
President  
Counsel Financial

Ladies and Gentlemen,

I would like to provide some important bullet points to seek out a bold approach to the lien resolution process.

### **Lien Resolution the New Pathway to Suicide for My NFL Brothers?**

Back in early 2014, the National Football League achieved what it called a "[huge victory](#)." thanks to some nudging and millions of dollars from the NFL, California passed a law banning NFL players from filing workers' comp claims within the state of California. AB1309 closed a legal loophole that let NFL players collect large cash settlements by claiming they suffered cumulative trauma during their professional careers.

### **The NFL Concussion Settlement & CTE**

Players diagnosed in the future with chronic traumatic encephalopathy (CTE), a condition linked to repeated blows to the head, will not be covered by the NFL concussion settlement! The estates of players diagnosed posthumously with CTE between 2006 and 2014 can seek up to \$4 million.

CTE, cannot be diagnosed in the living, and future deaths will be excluded from the settlement! Never again is it now relevant if a guy dies from CTE! "The guys who died for us after 2014, don't even get paid."

"The NFL Owners by this settlement will never have to say what they knew, when they knew it, and anything about CTE? Poof! It's gone,"

Of the myriad of problems my brothers face now at the possibility of their last fat, one-time



lump sum payout, what we have to focus on is what will be left of my brothers settlement money after the lien resolution process?

These proposed sources of funds players could invest not only relate to current mistakes (Bad Loans) and damage done but will also now be subject to the ugly monster that hangs over my NFL Brothers settlements, **The Lien Resolution Process!**

### **To breakdown the obstacles of NFL Concussion Settlement:**

The NFL Concussion Settlement states that only participating Qualified BAP Providers can conduct BAP baseline assessment examinations, NFL retired players with neurocognitive impairment can no longer receive an independent examination without being exposed to a 10% penalty on their settlement.

The BAP Administrator is Garretson Resolution Group, Garretson Resolution Group is also The Lien Resolution Administrator (They pick the doctors who will qualify my brothers for a settlement and then they expose them to the lien resolution process), and they will be paid a free ride out of the Monetary Award Fund.

**Conflicts of Interest?:** Within ninety (90) days after the Effective Date, Co-Lead Class Counsel, Counsel for the NFL Parties, the Special Master and the Lien Resolution Administrator will establish and implement procedures to promptly detect and resolve possible conflicts of interest between the Lien Resolution Administrator, including, without limitation, its executive leadership team and all employees working on the Class Action Settlement, on the one hand, and Settlement Class Members (and counsel individually representing them, if any), the NFL Parties, Counsel for the NFL Parties, or the Special Master, on the other hand. Co-Lead Class Counsel, Counsel for the NFL Parties, and the Lien Resolution Administrator; subject to approval of the Special Master (or the Court after expiration of the term of the Special Master and any extension(s) thereof), may modify such procedures in the future, if appropriate. Notwithstanding anything herein to the contrary, Co-Lead Class Counsel, Counsel for the NFL Parties, and the Special Master understand that the Lien Resolution Administrator regularly provides lien resolution and other related services to settling parties and their attorneys, and the Special Master, Co-Lead Class Counsel, and Counsel for the NFL Parties acknowledge and agree that it shall not be a conflict of interest for the Lien Resolution Administrator to provide such services to such individuals or to receive compensation for such work.

The Lien Resolution Administrator will, among other responsibilities set forth in this Settlement Agreement, administer the process for the identification and satisfaction of all applicable Liens.

Each Settlement Class Member (and his or her respective counsel, if applicable) claiming a Monetary Award or Derivative Claimant Award, however, will be solely responsible for the satisfaction and discharge of all Liens.

The Parties, Co-Lead Class Counsel, Class Counsel, Subclass Counsel, Counsel for the NFL Parties, and the Special Master, and their respective Affiliates, will not be liable for any act, or failure to act, of the Lien Resolution Administrator.

**The Lien Resolution Administrator** will put in place a mechanism for resolving Liens owed to other Governmental Payer's or Medicare Part C or Part D Program sponsors, undertake to obtain an agreement in writing and other supporting documentation with Class Members promptly following the Effective Date.

### **We need to know!**

What is the extent of Garretson Resolution Group reach, are they just limited to healthcare liens, there is no mention of any other liens, for e.g. Tax, Mechanic, Judicial, Child support, judgements, liens placed by lawyers who have been released by a player.

Notwithstanding any other provision of this Settlement Agreement relating to timely payment, if any person or entity claims any Liens, other than those set forth with respect to a Settlement Class Member's Monetary Award or Derivative Claimant Award, then the Claims Administrator will not pay any such Monetary Award or Derivative Claimant Award if the Claims Administrator or Lien Resolution Administrator has received notice of that Lien and there is a legal obligation to withhold payment to the Settlement Class Member under applicable federal or state law. The Claims Administrator will hold such Monetary Award or Derivative Claimant Award in an escrow account until the Settlement Class Member (and counsel individually representing him or her, if any) presents documentary proof, such as a court order or release or notice of satisfaction by the party asserting the Lien, that such Lien has been satisfied and discharged; or until the Lien Resolution Administrator's determination of the "holdback" amount to be deducted from the Monetary Award, Supplemental Monetary Award or Derivative Claimant Award under which such reimbursement obligation will be resolved.

**Indemnification:** Each Settlement Class Member, on his or her own behalf, and on behalf of his or her estate, predecessors, successors, assigns, representatives, heirs, beneficiaries, executors, and administrators, in return for the benefits and consideration provided in this Settlement Agreement, will indemnify and forever hold harmless, and pay all final judgments, damages, costs, expenses, fines, penalties, interest, multipliers, or liabilities, including the costs of defense and attorneys' fees of, the Released Parties against any and all claims by Other Parties arising from, relating to, or resulting from (a) any undisclosed Lien relating to, or resulting from, compensation or benefits received by a Settlement Class Member pursuant to this Class Action Settlement and/or (b) the failure of a Settlement Class Member timely and accurately to report or provide information that is necessary for compliance with the MSP Laws, or for the Lien Resolution Administrator to identify and/or satisfy all Governmental Payer's or Medicare Part C or Part D Program sponsors who may hold or assert a reimbursement right. The amount of indemnification will not exceed the total Monetary Award or Derivative Claimant Award for that Settlement Class Member's claim.

No Settlement Class Member (or counsel individually representing them, if any) will have any rights or defenses based upon or arising out of any act or omission of the NFL Parties or any Administrator.

**My NFL brothers need a Defensive Structure, a Barrier that can be employed for defense against the lien resolution attack and bad loans to maximize their settlement!**

Once a player has gone through the Claims Process and reached a settlement, do we have a mechanism in place to fight for the player against the devastation that certainly could occur and wipe him out?

Can we aggressively resolve liens and bad loans and preserve settlements for retired NFL players prior to any claims settlement?

## **Is There a Solution?**

Can we call upon healthcare advocates such as CareGuard, or outsource lien resolution to Providio and Synergy companies that have policies and practices in place to ensure that Garretson Resolutions abide by the ethical guidelines?

### **Fred Willis**

Founder, President & CEO HPN Neurologic Inc.  
Founder, President & CEO HPN Concussion Management Inc.  
Founder, Executive Director NFL Players Brains Matter

*"Fred Willis is a proud brain donor VA-BU-SLI Brain Bank, hoping to make a difference in the scientific understanding of CTE"*

O: (978) 526-0928 | Cell/Text: (508) 212-2074 | Fax: (978) 526-0929

### **Please click on our website links below**

<http://nflplayersbrainsmatter.com/>  
<http://concussiontreatmenthelp.com/>  
<http://www.hpnconcussionmanagement.com>  
<http://www.hpnneurologic.com>

### **HPN Neurologic**

811 Summer St.  
Manchester-by-the-Sea, Ma. 01944

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# Exhibit 3

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**From:** [REDACTED]  
**Date:** March 8, 2017 at 10:11:11 AM EST  
**To:** Chris Seeger <[cseeger@seegerweiss.com](mailto:cseeger@seegerweiss.com)>  
**Subject:** Fwd: From: Fred Willis Executive Director NFL Players Brains Matter Re: Meeting on The Lien resolution Process for the NFL Concussion Settlement

Sent from my iPhone

Begin forwarded message:

**From:** fred willis <[fred.willis@hpnneurologic.com](mailto:fred.willis@hpnneurologic.com)>  
**Date:** March 8, 2017 at 10:02:55 AM EST  
**To:** 'Fernandez Anderson' <[fanderson@msettlements.com](mailto:fanderson@msettlements.com)>  
**Cc:** [tbolar@aol.com](mailto:tbolar@aol.com), [Jess@plaintiffsupport.com](mailto:Jess@plaintiffsupport.com), 'Gary Goldberg' <[ggoldberg@providiollc.com](mailto:ggoldberg@providiollc.com)>, [pcody@counselfinancial.com](mailto:pcody@counselfinancial.com), [mtorbert@ametrosfinacial.com](mailto:mtorbert@ametrosfinacial.com), [REDACTED]  
**Subject:** FW: From: Fred Willis Executive Director NFL Players Brains Matter Re: Meeting on The Lien resolution Process for the NFL Concussion Settlement



**HPNNEUROLOGIC<sup>®</sup>**

HPN CONCUSSION MANAGEMENT	NFL PLAYERS BRAINS MATTER	HIGH PERFORMANCE NEUROFEEDBACK
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*"A LEADING EDGE NEUROFEEDBACK & BRAIN HEALTH COMPANY."*

**HPNNEUROLOGIC.COM**

March 8, 2017

Fernandez Anderson, CSSC  
Senior Consultant  
Millennium Settlements

Fernandez,

I want to thank you and your associates for your time yesterday, hopefully our discussion will lead back to a response to my NFL brothers.

I would like to go out with a message ASAP, I look forward to your response.

Regards,

**Fred Willis**

Founder, President & CEO HPN Neurologic Inc.

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# Exhibit 4

**From:** [REDACTED]  
**Date:** March 21, 2017 at 4:22:10 PM EDT  
**To:** Chris Seeger <[cseeger@seegerweiss.com](mailto:cseeger@seegerweiss.com)>  
**Subject:** Notification

I don't suppose the judge allocated money to notify players of settlement. Just talked to a Hall of Fame player who had no knowledge of settlement.

There's a group of seven guys calling themselves the Independent NFL Players Association who are trying to get players to join them in applying for settlement. Of course they charge.

Fred Willis is telling players that he'll fly them to CA to register. They believe him so they're not registering while awaiting Fred.

I'm trying to talk them out of these plans. UGH!

Sent from my iPhone